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July 27, 2023

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

**Re: *Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.*,
Case No. 19-cv-9399
Status Letter**

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced action and respectfully submit the instant letter in accordance with the Court’s May 25, 2023 Order. (Dkt. 98).

As indicated in Plaintiff’s May 25, 2023 status letter (Dkt. 97), Plaintiff’s counsel has been communicating with an attorney, who, upon information and belief, previously worked with Mr. Orel and now represents the Orel Defendants. Since May 25, 2023, Plaintiff’s counsel and new counsel for the Orel Defendants have continued to make progress in our settlement discussions and Plaintiff’s counsel anticipates settling with some, if not all of the Orel Defendants. Accordingly, Plaintiff respectfully requests additional time to continue its settlement discussions with the Orel Defendants and requests to (1) submit a status letter providing the Court with an update on the parties’ settlement discussions, or (2) move for default judgment by August 25, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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